

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

AMALIA DIAZ TORRES, surviving
spouse of ELEAZAR TORRES GOMEZ,

Plaintiff,

vs. No. CJ-2007-04581
Judge Gordon McAllister

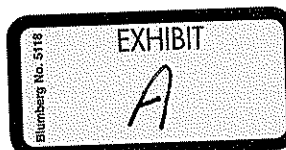
CINTAS CORPORATION, LAVATEC, INC.,
CHARLES "CHIP" BENSON, STEVE
JORDAN, and TOMMY COCANOUGH, and
Defendants.

DEPOSITION OF AMALIA DIAZ TORRES
THROUGH INTERPRETER TERESA CARBALLO,

before the undersigned Certified Shorthand Reporter,
taken on behalf of the Defendant Cintas, at 1700
Southwest Boulevard, Tulsa, Oklahoma, commencing at
9:12 a.m., on March 4, 2008, pursuant to notice.

MARY A. MARTIN, CSR, RPR, #315

NICHOLS McCLANAHAN REPORTING
Two Main Plaza
616 South Main, Suite 302
Tulsa, Oklahoma 74119-1261
918/585-9969



1 A. Me personally, no.

2 Q. Any other member of your family?

3 A. You mean that they would have said
4 something to?

5 Q. Yes.

6 A. My son.

7 Q. Your son, Emmanuel?

8 A. Yes.

9 Q. Okay. Now, ma'am, I notice that you have
10 a lawyer here in Tulsa and lawyers from McAllen,
11 Texas.

12 A. Yes.

13 Q. Did you know any of them before your
14 husband's death?

15 A. No.

16 Q. Now again, I don't want to know anything
17 that you've talked about with them; okay? But I do
18 want to know how you came to select them.

19 MR. OCHOA: Objection to form.

20 Q. (By Mr. Buck) Which of the lawyers, Mr.
21 Frasier or Mr. Ochoa and his firm, which one did you
22 have contact with first?

23 MR. OCHOA: Object to the form.

24 A. Lino and Ricardo.

25 Q. So the firm from McAllen, Texas?

Nichols McClanahan Reporting
(918) 585-9969

1 A. Yes.

2 Q. How did you learn about them?

3 MR. FRASIER: Let me interrupt and object.
4 Can you tell me where that's going to go and how
5 that's going to help advance the discovery in this
6 case?

7 MR. BUCK: It's not privileged. I mean,
8 it's -- you can object. It's not privileged. It's
9 relevant for a theory of the case that we have.

10 MR. FRASIER: Okay. Okay. I'm sorry to
11 interrupt.

12 Q. (By Mr. Buck) How did you learn -- I
13 believe my question was how did you learn of the firm
14 in McAllen, Texas?

15 A. Because of my son.

16 Q. How did he know?

17 A. I don't know a lot about this. Maybe he
18 can answer you better.

19 Q. Okay. So --

20 A. We found out about them through the
21 Mexican consulate.

22 Q. Okay. Okay. So he, your son, told you
23 about this firm in McAllen, Texas?

24 A. Yes.

25 Q. How long after your husband's death did

Nichols McClanahan Reporting
(918) 585-9969

1 you contact that firm in McAllen, Texas?

2 A. In the first month, in the month.

3 Q. Could it have been as soon as the first
4 two weeks?

5 A. I don't remember.

6 Q. Okay. Now how did you then come to have
7 Mr. Frasier and his firm as your lawyer?

8 A. Needed an attorney here in Tulsa and they
9 recommended Frank.

10 Q. Okay. And you did not know Mr. Frasier
11 before the accident?

12 A. No.

13 Q. Are you aware, Mrs. Torres, that a
14 workers' compensation claim was filed in this -- for
15 your husband, on behalf of your husband?

16 THE INTERPRETER: Against or for?

17 MR. BUCK: No, no, on behalf of.

18 A. You mean a claim me against them?

19 Q. (By Mr. Buck) No, no, no. Because your
20 husband was hurt or killed at work, there's workers'
21 compensation. Are you familiar with workers'
22 compensation?

23 THE INTERPRETER: She is saying I
24 don't --

25 A. How can I explain? I don't understand the